

SEALED

FILED

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

JUL 10 2024

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARCUS EDWARD LEE,

Defendant.

BONNIE HACKLER
Clerk, U.S. District Court

By _____
Deputy Clerk

SEALED

Case No. **24 CR 113 RAW**

INDICTMENT

The Federal Grand Jury charges:

COUNT ONE

**DISTRIBUTION OF CERTAIN MATERIAL INVOLVING
THE SEXUAL EXPLOITATION OF A MINOR
[18 U.S.C. §§ 2252(a)(2) & (b)(1)]**

Beginning on or about January 20, 2022, and continuing until on or about May 20, 2024, in the Eastern District of Oklahoma, the defendant, **MARCUS EDWARD LEE**, did knowingly distribute any visual depiction using any means and facility of interstate and foreign commerce and that has been shipped and transported in and affecting interstate and foreign commerce, the production of which involved the use of a minor engaging in sexually explicit conduct, as that term is defined in Title 18, United States Code, Section 2256(2), and said visual depiction was of such sexually explicit conduct, in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

COUNT TWO

**POSSESSION OF CERTAIN MATERIAL INVOLVING
THE SEXUAL EXPLOITATION OF A MINOR
[18 U.S.C. §§ 2252(a)(4)(B) & (b)(2)]**

On or about May 20, 2024, in the Eastern District of Oklahoma, the defendant, **MARCUS**

EDWARD LEE, did knowingly possess and access with the intent to view, one or more matters which contained visual depictions the production of which involved the use of a minor engaging in sexually explicit conduct, as that term is defined in Title 18, United States Code, Section 2256(2), including visual depictions of prepubescent minors and minors who had not attained twelve years of age, and said visual depictions are of such sexually explicit conduct and had been transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and which was produced using materials which have been so shipped and so transported, by any means including by computer, in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and (b)(2).

FORFEITURE ALLEGATION
[18 U.S.C. § 2253]

1. The allegations contained in Counts One and Two of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 2253.

2. Upon conviction of the violations charged in Counts One and Two of this Indictment involving violations of Title 18, United States Code, Sections 2252(a)(2), (a)(4)(B), (b)(1), and (b)(2), the defendant, **MARCUS EDWARD LEE**, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, any and all of the defendant's right, title and interest in:

a) any visual depiction described in section 2251, 2251A, or 2252, 2252A, 2252B, or 2260 of chapter 110 of Title 18, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received;

b) any property, real or personal, constituting or traceable to gross profits or

other proceeds obtained from the offense; and

c) any property, real or personal, used or intended to be used to commit or to promote the commission of the offense or any property traceable to such property.

3. The property subject to forfeiture, pursuant to Title 18, United States Code, Section 2253, includes, but is not limited to:

- one (1) Samsung Galaxy Note 20, IMEI: 353853644777455; and
- one (1) LG Cellphone, IMEI:355380-09-877114-7.

A TRUE BILL:

CHRISTOPHER J. WILSON
United States Attorney


JOSHUA SATTER, NYBA # 5477112
Assistant United States Attorney

Pursuant to the E-Government Act,
the original indictment has been filed
under seal in the Clerk's Office.

s / Foreperson
FOREPERSON OF THE GRAND JURY